

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

David Johnson,	)	
individually and on behalf	)	
of all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:16-cv-00947 SRB
	)	
Corecivic	)	
	)	
and	)	
	)	
Securus Technologies, Inc.	)	
	)	
Defendant.	)	

**PLAINTIFF’S NOTICE OF RULE 30(b)(6)  
DEPOSITION OF DEFENDANT SECURUS TECHNOLOGIES, INC.**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff will take the deposition of Defendant Securus Technologies, Inc. (hereafter, “Defendant”), by a person or persons designated by Defendant, before a court reporter authorized by law to administer oaths. The deposition will begin at 9:00 a.m. on April 13, 2018, at the offices of Lee & Braziel, Landmark Center, 1801 North Lamar Street, Suite 325 Dallas, Texas 75202, or such other place and time as agreed to by the parties, and continue from day to day until completed. The deposition shall be recorded by audio, stenographic and/or videotape means.

Defendant shall designate one or more officers, directors, managing agents, or other persons to testify on Defendant’s behalf, and shall set forth, for each person designated, the matters on which the person will testify. The person(s) so designated by Defendant shall testify on matters known or reasonably available to Defendant concerning the following subjects:

### **DEPOSITION TOPICS**

1. The organizational, management, and geographic structure of Defendant from 2011 to the present.
2. For the Relevant Period, Defendant's general business operations and services it provides to Corecivic, including but not limited to CCA-Leavenworth (CCA-L).
3. For the Relevant Period, Defendant's business relationship with the Board of Prisons Trustee, Corecivic, Praeses, and any other entity involved with the operations of CCA-L.
4. For the Relevant Period, the department or individual(s) of and/or employed by Defendant that/who determines what, if any, telephonic recording devices will be used and the circumstances in which they will be used to record detainee conversations in Corecivic's facilities, including CCA-L.
5. Requests for privatization and privatization of phone calls and any discrepancies between Corecivic records and Securus records.
6. The nature of the contractual relationship between Corecivic and Securus.
7. Steps taken, if any, to identify attorney phone numbers on the Securus Call Platform.
8. The process of privatization of phone numbers on the Securus Call Platform, and any situations where a number may become de-privatized.
9. Types and locations of notices given to detainees at CCA-L and other Corecivic facilities informing them that their conversations may be monitored and/or recorded (both in person and telephonically).
10. The training and support and/or customer service provided to employees and/or contractors about the use of Securus equipment and/or programs to monitor and/or record phone conversations at the CCA-L facility.
11. The training provided to employees and/or contractors about the use of other equipment and/or programs used to monitor and/or record communications, including but not limited to telephone communications at the CCA-L facility.
12. From 2011 to the present, the policies and procedures by which detainees may request an unmonitored communication and the method of recording or documenting of such requests.
13. Administrative Subpoenas and other requests made from third parties for the disclosure of detainee communications, including, but not limited to attorney/client phone calls.
14. Locations of telephones at the CCA-L facility from 2011 to present.

15. How parties using the Securus call platform are notified that their call is or is not being recorded, and any situations where that notification was not given, despite a recorded phone call, and whether the notification varies by location based on client parameters.

16. A list of all recording devices used at CCA-L that may have monitored detainee communications with their attorneys, including but not limited to telephone, software, video and other recording methods.

17. The authenticity and substance of all documents produced by Defendant to date in this litigation.

18. Formal and informal complaints regarding the recording of attorney phone calls by Corecivic from 2006 to the present.

19. A description of Defendant's electronic systems and design for the Secure Call Platform it operates/operated in conjunction with the Contract with Corecivic/CCA, including but not limited to their functions and their geographical locations. This includes but is not limited to the call platform, storage, location and function of servers, email systems, intranet systems, and the word processing applications used by Defendant's personnel and personnel working with CCA-L.

20. Discussion regarding the patents of the Securus system, as produced in this case so far.

21. The existence and location of documents responsive to Plaintiff's requests for production of documents, including the issuance of a "hold notice," how searches were conducted, what data sources were searched, how documents were retrieved, whether potentially relevant or responsive documents were identified and/or quarantined, and who was involved in the process.

22. The facts supporting any of Defendant's factual or legal defenses asserted in its response to Plaintiff's Amended Complaint.

23. Any complaints, lawsuits, investigations, studies and/or audits by, for or against Defendant since 2010 regarding the recording of attorney communications at CCA-L and/or any other federal facility contracted with the Board of Prisons Trustee.

24. Communications to, from and/or between Defendant and any class members about the subject matter of this lawsuit.

25. Defendant's record retention policies and practices relating to electronically stored information.

26. Defendant's attempts to identify and preserve relevant information related to this lawsuit.

27. Defendant's electronic information back up and disaster recovery plans and procedures, including the location of backup media, what is contained on backup media, what

types of backup media Defendant uses, whether and how backup data can be restored and searched, and the time period for Defendant's backup data.

28. Any modifications to procedures pertaining to the recording of attorney communications since the filing of this lawsuit.

29. For the relevant period, the Department/s and/or individuals who have access to and were responsible for accessing, activating and/or deactivating telephone recording devices used to record detainee phone conversations.

Respectfully Submitted,

**The Hodgson Law Firm, LLC**

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of April, 2018, a true and correct copy of the foregoing was filed electronically with the Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorney(s) of record:

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**ATTORNEYS FOR DEFENDANT  
SECURUS TECHNOLOGIES, INC.**

By: s/Michael A. Hodgson

ATTORNEYS FOR PLAINTIFFS AND THE  
PUTATIVE CLASS